

# PacifiCorp - Stakeholder Feedback Form

## 2019 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2019 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

Date of Submittal 10/17/2018

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Address: 201 High Street Suite 100

City: Salem

State: Oregon

Zip: 97301

Public Meeting Date comments address: 7/26/2018

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

[Click here to enter text.](#)

\*IRP Topic(s) and/or Agenda Items: List the specific topics that are being addressed in your comments.

Distribution System Planning

Check here if any of the following information being submitted is copyrighted or confidential.

Check here if you do not want your Stakeholder feedback and accompanying materials posted to the IRP website.

\*Respondent Comment: Please provide your feedback for each IRP topic listed above.

Public Utility Commission of Oregon Staff (Staff) appreciates PacifiCorp's presentation and information relating to the Distribution System planning presentation provided at the 2019 IRP Public Meeting held on July 26, 2018. Staff offers the following comments requesting further clarity and additional information so as to more meaningfully participate in this process.

Please see PacifiCorp's IRP presentation from July 26, 2018, slides 38-47. The presentation discusses three different types of Distribution System Planning studies: the distribution system planning (DSP) study, Area Planning study, and Transmission studies.

The Company should explain whether the slides on pages 40-47 are primarily concerned with the five-year DSP study or whether they also involve the Area Planning study and Transmission studies and whether the study is only conducted every five years. If so, when were the last two studies conducted, and when will the next DSP study be conducted?

### **PacifiCorp Response:**

Slides 40 through 47 and the discussion during the July 26, 2018 Integrated Resource Plan (IRP) public input meeting were intended to provide a high-level overview of PacifiCorp's existing distribution system planning, area planning, and transmission planning study processes. The slides are not intended to provide a detailed overview of any one study process, but more generally describe the focus of each study and the tools used to perform those studies.

\* Required fields

Distribution system planning studies are performed on a rotating basis across PacifiCorp's distribution areas, with a typical review period of 36 to 60 months in each distribution area. PacifiCorp prioritizes review of distribution areas with significant changes (load growth, system topology changes, recently completed projects, etc.). PacifiCorp's distribution system is divided amongst 76 distribution planning areas within the Pacific Power (PP) system, and 90 distribution planning areas in Rocky Mountain Power (RMP) system. PacifiCorp completes distribution system planning studies on approximately 12 to 18 distribution areas in the PP system, and 22 to 25 distribution areas in the RMP system each calendar year.

The Company should clarify whether there have been any material changes to the DSP studies over the past fifteen years. If material changes occurred, the Company should explain the material changes.

**PacifiCorp Response:**

Yes, most distribution system planning studies will identify some new constraints in the area being studied and identify new upgrade requirements relative to the previous study in that distribution area.

Staff is interested in knowing more about the Company's Area Planning study. Is it only conducted every 10 years? When were the last two Area Planning Studies conducted? When will the next Area Planning Study be conducted?

**PacifiCorp Response:**

Area planning studies, also referred to as "transmission system five-year studies", are performed on a rotating basis across the 18 local transmission areas in the Pacific Power (PP) system, and 22 local areas in the Rocky Mountain Power (RMP) system, with typical review periods ranging from 24 months to 60 months in each local transmission area. PacifiCorp prioritizes review of local transmission areas with significant changes (load growth, system topology changes, recently completed projects, etc.) and completes area planning studies for approximately three local transmission areas in the PP system, and seven local transmission areas in the RMP system each calendar year. Additionally, PacifiCorp performs annual load projection updates and re-evaluates the need and timing of each load growth and reliability based local transmission project on an annual basis.

Have there been any material changes to the Area Planning studies over the last 20 years? If so, please explain the material changes.

**PacifiCorp Response:**

Yes, most area planning studies will identify some new constraints in the area being studied and identify new upgrade requirements relative to the previous study in that local transmission area. Additionally, sections such as transformer tap position, capacitor bank settings, switching recommendations and outage summaries are updated in each study review. As a result, each study update is materially different from the prior version of the study in that local transmission area.

The Company should clarify what it means when it discusses "Transmission studies." Do these include studies done by outside parties such as NTTG, Columbia Grid, and BPA, or are they studies specific to PacifiCorp? The Company should provide a high-level and publicly available summary of key takeaways from its last two internal DSP studies. The Company should also provide a high-level and publicly available summary of its last two Area Planning Studies.

**PacifiCorp Response:**

PacifiCorp completes many studies that could be classified as transmission studies on the Bulk Electric System (BES). On an annual basis, PacifiCorp completes a North American Electric Reliability Corporation (NERC) transmission planning (TPL) assessment, NERC TPL-001-4. The NERC TPL-001-4 planning assessment is a comprehensive evaluation of steady-state, stability and short circuit capability of the transmission system in accordance with the NERC Reliability Standard requirements, and Western Electricity Coordinating Council (WECC) Regional Criterion. The study evaluates summer peak loading in Year 1 and Year 2, Year 5 and Year 10 cases in both the PP and RMP areas; light loading conditions in a Year 1 and Year 2 case in both the PP and RMP areas; and winter peak loading in Year 1 and Year 2 and Year 5 cases in only the PP area. Up to 375,000 unique contingency combinations are run in each seasonal case. The NERC TPL-001-4 Reliability Standard requires Transmission Planners and Planning Coordinators to develop Corrective Action Plans for each identified

\* Required fields

deficiency of the performance requirements of the Standard. Corrective Action Plans may include capital projects or operating procedures necessary to avoid criteria violations.

Additionally, on a biennial basis, PacifiCorp completes a Local Transmission System Plan under Attachment K of the company's Open Access Transmission Tariff (OATT). This Local Transmission Plan is posted to the Open Access Same Time Information System (OASIS) and is available to all registered OASIS users. PacifiCorp also participates in Federal Energy Regulatory Commission (FERC) Order 1000 regional transmission planning studies through the Northern Tier Transmission Group (NTTG) and informs Columbia Grid's FERC Order 1000 regional transmission planning study.

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**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

[Click here to enter text.](#)

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated.

[Click here to enter text.](#)

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Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.

\* Required fields